

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

STEPHEN M. BEVERLY,

Plaintiff,

v.

Civil Action No. 3:07cv469

WAL-MART STORES, INC.,

Defendant.

STEPHEN M. BEVERLY, *et al.*,

Plaintiffs,

v.

Civil Action No. 3:07cv541

CHOICEPOINT INC., *et al.*,

Defendants.

**JOINT MOTON FOR ORDER GRANTING PRELIMINARY APPROVAL OF
SETTLEMENT, CERTIFYING CLASS FOR PURPOSES OF SETTLEMENT,
APPOINTING CLASS COUNSEL,
DIRECTING NOTICE TO THE CLASS AND SCHEDULING FAIRNESS HEARING**

Pursuant to Fed. R. Civ. P. 23(e) and to Local Civil Rule 7 of the Rules of this Court, plaintiffs, Stephen M. Beverly and Bruce Smith, by counsel, on behalf of themselves and all members of the proposed Settlement Class, and defendants, Wal-Mart Stores, Inc. and Choicepoint WorkPlace Solutions Inc., *et al.*, by counsel, respectfully move this Court for the entry of an Order preliminarily approving a proposed class settlement in this action, certifying settlement classes for purposes of this proposed class settlement, appointing class counsel,

approving the form and manner of notices proposed to be sent to all members of the settlement classes, and scheduling a fairness hearing.

A copy of the proposed Settlement Agreement and Release memorializing the terms of the proposed class settlement and the form of notices is attached hereto as Exhibit 1.

In support of their Joint Motion, the parties hereby rely upon the Memorandum in Support previously filed herein.

STEPHEN M. BEVERLY and BRUCE J. SMITH

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**CHOICEPOINT INC. and
CHOICEPOINT WORKPLACE SOLUTIONS INC.**

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